

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BRANDON SMIETANA and)
SKYCOIN GLOBAL FOUNDATION LIMITED,)
a Singapore company, and SYMBOLIC)
ANALYTICS INC. a Delaware Corporation)
)
Plaintiffs,) Case No. 1:22-cv-00708
)
v.)
) Honorable Sara L. Ellis
BRADFORD STEPHENS,)
AARON KUNSTMAN,)
HARRISON GEVIRTZ, f/k/a “HaRRo”,) JURY DEMANDED
RYAN EAGLE,)
FAR AHEAD MARKETING, LLC.,)
JOEL WAYNE CUTHRIELL f/k/a “JOEL”,)
MORGAN PECK, CATHERINE BYERLY,)
STEVEN LEONARD, JOSHUA OGLE,)
AMERICAN PUBLISHERS, INC. d/b/a)
CONDÉ NAST, AMERICAN)
PUBLISHERS, INC. d/b/a CONDÉ NAST d/b/a)
THE NEW YORKER MAGAZINE, and)
UNKNOWN INDIVIDUALS AND COMPANIES)
)
Defendants.)
)

**PLAINTIFFS’ UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
AMENDED COMPLAINT**

NOW COME Plaintiffs, BRANDON SMIETANA (“Smietana”), SKYCOIN GLOBAL FOUNDATION LIMITED, a Singapore Company, and SYMBOLIC ANALYTICS, INC., a Delaware Corporation (“SA”), by and through their attorneys, The Law Office of Michael C. Goode, respectfully requesting that this Honorable Court grant Plaintiffs’ Unopposed Motion for Extension of Time to Extend Briefing Schedule, and in support Plaintiffs state as follows:

1. On September 20, 2022, Plaintiffs filed their Second Amended Complaint. (Dkt. No. 59).
2. Defendants Ryan Eagle, Bradford Stephens, Catherine Byerly, and Far Ahead Marketing (“FAM”) individually filed respective Motions to Dismiss on October 18, 2022, in response to Plaintiffs’ second amended complaint. (Dkt. Nos. 51, 52, 53, 54).
3. On May 30, 2023, this Court entered an Opinion and Order granting Stephens', Byerly's, and Eagle's motions to dismiss.
4. The Court dismissed the second amended complaint without prejudice and deferred consideration of the state law claims until Plaintiffs plead a sufficient basis for subject matter jurisdiction.
5. The Court granted Defendant FAM's motion to dismiss without prejudice.
6. The Court then granted Plaintiffs until June 30, 2023, to file a third amended complaint.
7. Plaintiff Smietana is currently in China.
8. Plaintiffs’ counsel has encountered issues getting into contact with Smietana in order to discuss amendments to be made to the current Complaint.
9. On June 29, 2023, counsel for Plaintiffs contacted counsel for the above-named Defendants, regarding a one-week extension to file their amended complaint.
10. Defendants’ counsel did not object to the extension.
11. This is Plaintiffs’ first extension request from this Court’s May 30, 2023 ruling.
12. Therefore, Plaintiffs respectfully ask this Court to grant a one-week extension, so that counsel can confer with their clients and submit an amended complaint.

DATED: June 30, 2023

Respectfully submitted,

/s/ Michael Goode
Attorney for Plaintiffs

Michael C. Goode, Esq.
Michael C. Goode & Company
111 W. Washington Street, Suite 1750
Chicago, Illinois 60602
Phone: (312) 541-1331
Lawoffice_mcgoode@yahoo.com